

JOINT DEFENDANTS' PRIMARY WITNESS LIST
EXHIBIT "D"

Joint Defense Non-Company Representatives - Primary List	
Martin Maner, P.E.-Chief	Water Quality, pollution sources, enforcement, regulated facilities and compliance issues in the IRW
Ron Duncan-NW Arkansas Representative	Recreational use of the Illinois River and observed environmental quality of the Illinois River
John Fazio-District Inspector - Water Division (Benton, Madison and Washington Counties)	Water quality regulations and watershed management, poultry activities in the IRW, agricultural and environmental regulations
Patrick Fisk-Land Resource Specialist	Water quality regulations and watershed management, poultry activities in the IRW, agricultural and environmental regulations
Mike Guess-Water Use Specialist	Water quality regulations and watershed management, poultry activities in the IRW, agricultural and environmental regulations
Jeffrey Tyler-District Inspector - Water Division (Crawford, Franklin, Sebastian Counties)	Water quality regulations and watershed management, poultry activities in the IRW, agricultural and environmental regulations
Allison West -District Inspector - Water Division (Benton, Madison and Washington Counties)	Water quality regulations and watershed management, poultry activities in the IRW, agricultural and environmental regulations
Earl Smith-Chief	Water quality, monitoring, nonpoint source pollution, animal waste, poultry activities in the IRW, agricultural and environmental regulations
J. Randy Young, P.E. -Member of the Arkansas-Oklahoma Arkansas River Compact Commission	Poultry industry, regulations, nonpoint source pollution, animal waste, water quality and enforcement
Ron Jarman-Senior Environmental Manager	Sources of contaminants in the water of the Illinois River Basin
Roger Olsen-	Facts and circumstances regarding the handling, testing and reporting of laboratory samples received by CDM. Authentication of documents related to laboratory sampling. State of Oklahoma's authorization of the use of poultry litter, acts and omissions of the State of Oklahoma which have contributed to the degradation of water in the IRW

Jay Churchill-Sampling Team	Observation of State of Oklahoma sampling events of poultry houses and soil sampling where poultry litter had been applied.
Doug Schooley-	Mining in the IRW, Department of Mines records. State of Oklahoma's authorization of the use of poultry litter, acts and omissions of the State of Oklahoma which have contributed to the degradation of water in the IRW
John Littlefield-Poultry Inspector	IRW Poultry growing operations; ODAFF poultry inspections and/or complaints
Dr. John Berton Fisher-	Facts and Circumstances associated with sampling on behalf of State of Oklahoma
Anthony Lawrence-District Conservationist	Poultry waste programs and nutrient management plans
Mike Thralls-Executive Director	OCC Agency operation and programs
Shannon Phillips (Haraughty) -Assistant Director and Custodian of Records	OCC Water Quality programs; agency records; poultry waste management practices; poultry waste; pollution sources; water quality; water quality monitoring; best management practices; waste hauling program and IRW history and conditions
Ed Abernathy-contractor	Creation, implementation and strategy behind waste management plans
Mark Bays-Forester IV	Urban and community forestry programs
Gary Bledsoe-Contractor	State Agricultural programs and poultry waste land application
Sancho Dickinson-Director of Consumer Protection Services	Consumer Protection Services and Consumer Protection Programs and administrative functions for ODAFF
Teena Gunter-Deputy General Counsel	OFaff programs, poultry operations, waste management practices, Oklahoma poultry law and regulations, history of poultry industry in Oklahoma, registered poultry feeding operations in Oklahoma, land application sites, State response cost for ODAFF, agency records and water quality
Terry Peach-Commissioner of Agriculture	ODAFF programs, poultry industry, and animal waste
Dan Parrish-Director	ODAFF Environmental Management Services Division; records; state programs; enforcements; animal waste issues; poultry operations; poultry industry practices and water quality
David Berry-Poultry Inspector	IRW Poultry growing operations; ODAFF poultry inspections and/or complaints
Robert Huber-Environmental Program Manager	ODEQ Programs, as well as policy, regulations, enforcement activities and records, ODEQ on-site waste disposal and POTW programs

Michael Madden-	ODEQ Programs, as well as policy, regulations, enforcement activities and records, ODEQ environmental inspections and complaints
Scott Thompson-Director of Land Protection	ODEQ land protection division; solid wastes disposal
Steven A. Thompson-Executive Director	ODEQ programs as well as agency policy, regulations and enforcement activities
Mark Derichsweiler-Engineering Manager for Watershed Planning and Storm water Permitting (Water Quality Certification)	ODEQ water quality programs, water quality monitoring and modeling, pollution sources, TMDLs, 303(d) lists, storm water, point sources and water quality.
Michael Harrell-Engineering Manager for Compliance Tracking/Public Water Supply Administration	Monitoring information received by ODEQ Water Quality Division including monitoring information from Public Water Supply concerning standards and disinfection byproducts; public water supply requirements, including disinfection byproducts; potable water
Carl Parrott-Division Engineer	ODEQ water quality programs and permits
James Crutcher, M. D. -Former Commissioner of Health	Public health and epidemiology; State Department of Health policies and programs
Alan Ford-Administrator of the Real Property Services Work Unit	State's ownership of property in the IRW
J.D. Strong-Secretary of the Environment	Environmental policy, administration, legislation, laws and regulations for State of Oklahoma; records for Oklahoma office of the Secretary of the Environment; animal waste; Animal waste task force; water quality; poultry industry practices; state programs; natural resource damages; pollution sources; state interest in natural resources; research; reports; remediation; state programs; IRW history and conditions; City of Tulsa Settlement
Miles Tolbert-Former Secretary of the Environment - member of the Arkansas-Oklahoma Arkansas River Compact Commission member	Environmental policy, administration, legislation, laws and regulations for State of Oklahoma; records for Oklahoma office of the Secretary of the Environment; animal waste; Animal waste task force; water quality; poultry industry practices; state programs; natural resource damages; pollution sources; state interest in natural resources; research; reports; remediation; state programs; IRW history and conditions; City of Tulsa Settlement; integrator-grower relationship
Hailan Zhang-Professor Nutrient Management Extension Specialist and Soil Water and Forage Analytical Laboratory Director	Animal waste, poultry industry practices, land application rates, agronomic rates, waste management practices, waste disposal, phosphorous and nutrient issues
Hardy Watkins-Executive Director	Tourism in IRW
Derek R. Smithee-Member of the Arkansas-Oklahoma Arkansas River Compact Commission - Oklahoma Member, Environmental and Natural Resources Committee	Monitoring (sample collections), water quality, pollution sources, reporting, planning, quality assurance, policy, administration for OWRB,
Duane A. Smith-Member of the Arkansas-Oklahoma Arkansas River Compact Commission - Oklahoma Commissioner, also a member of Governor Keating's Animal Waste and Water Quality Protection Task Force	Policies, administration and legislative functions of the OWRB; water quality; pollution sources; regulations; Compact Commission

Russell C. Dutnell-PE	Pollution Sources, streams and stream bank erosion in the IRW, IRW conditions
Hon. Jerry Hunton-County Judge; Contract Grower	Poultry management, nutrient management plans, best management plans, use of poultry litter as fertilizer; and facts and circumstances surrounding State's trespass upon personal property and unlawful taking.
William Banner, Jr., M.D., Ph.D.-	Facts and circumstances surrounding bacterial outbreaks in Oklahoma.
Clifford (Charlie) Brown-Litter Hauler	Facts and circumstances surrounding the use of poultry litter as fertilizer, management of agricultural lands, best management practices; value of poultry litter as a commodity.
Barry Clay-	Facts and circumstances surround the historic and current conditions in the Illinois River Watershed; recreational use of the Illinois River Watershed
Tony E. Robison	Facts and circumstances surrounding cattle ranching; hauling and application of poultry litter
James Cooksey-	Facts and circumstances surrounding the hauling of litter in Oklahoma and Arkansas
Gary T. Fisher	Former Oklahoma Department of Agriculture Food and Forestry Inspector; facts and circumstances surrounding use of poultry litter as fertilizer; best management practices; regulations governing use of poultry litter as fertilizer; investigations into complaints regarding activities within IRW.
Quang Pham – Contract Employee	ODAFF AEMS employee; facts and circumstances surrounding use of poultry litter as fertilizer; nutrient management plans; regulations governing poultry litter use; permitting process for poultry farmers. (Reserve right to add additional proposed testimony after deposition)
Jerry Green-	Facts and circumstances surrounding use of poultry litter; best management plans; and value of poultry litter as a commodity
Michael Langley-Litter Spreader	Facts and circumstances surrounding the use of poultry litter as fertilizer, management of agricultural lands, best management practices; value of poultry litter as a commodity.
Shawn Shrum-	Facts and circumstances surrounding the use and condition of the Illinois River Watershed
Bart Snyder-Litter Hauler	Facts and circumstances surrounding the use of poultry litter as fertilizer, management of agricultural lands, best management practices; value of poultry litter as a commodity.
Larry Dale Snyder-Litter Hauler	Facts and circumstances surrounding the use of poultry litter as fertilizer, management of agricultural lands, best management practices; value of poultry litter as a commodity.
Rex Thralls-	Facts and circumstances surrounding Governor Keating's Animal Waste and Water Quality Protection Task Force
Steven A. Wright-Outdoor Writer	Facts and circumstances surrounding the fishing in the IRW; existence of pollution sources within the IRW.
Billy Clay	Facts and circumstances surrounding agriculture history and current agricultural practices within the IRW

Joint Defense Experts	
William Banner, M. D.	Expert Testimony (deposed)
Victor Bierman, Ph.D.	Expert Testimony (deposed)
Jay Churchill	Expert Testimony (deposed)
Billy Clay, Ph.D.	Expert Testimony (deposed)
Frank Coale, Ph.D.	Expert Testimony (deposed)
John Connolly, Ph.D., P. E., D.E.E.	Expert Testimony (deposed)
James Chadwick	Expert Testimony (deposed)
Kenneth Cummins	Expert Testimony (deposed)
William Desvousges, Ph.D.	Expert Testimony (deposed)
Michael Dicks, Ph.D.	Expert Testimony (deposed)
Herbert DuPont, M. D.	Expert Testimony (deposed)
Herman Gibb, Ph.D.	Expert Testimony (deposed)
Wayne Grip	Expert Testimony (deposed)
Alex Horne, Ph.D.	Expert Testimony (deposed)
Ron Jarman, Ph.D.	Expert Testimony (deposed)
Steven Larson	Expert Testimony (deposed)
Michael McGuire, Ph.D.	Expert Testimony (deposed)
Richard Merritt, Ph.D.	Expert Testimony (deposed)
Gordon Rausser, Ph.D.	Expert Testimony (deposed)
Timothy J. Sullivan, Ph.D.	Expert Testimony (deposed)

Cal-Maine – Primary Witnesses	
Steve Storm-	Employee of Cal-Maine Foods who has knowledge of former operation in IRW.

Cargill – Primary Witnesses	
Ron and Kathy Aday Contract Growers	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Tim T. Alsup Agriculture Planner Cargill Turkey Production, LLC	Cargill Defendants' turkey production operations, practices, and policies
Rick Bickford Contract Grower	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Paul Biggs Contract Grower	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Earl Bishop Contract Grower	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Ed Brigance Contract Grower	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Darrel Bush Contract Grower	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants

Cargill – Primary Witnesses	
Gary Crockett Contract Grower	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Andy Davis, Ph.D.	Expert testimony regarding the matters identified in the witness’ Fed. R. Civ. P. 26(a)(2) disclosures, including any related supplements and errata.
Earnest Doyle Contract Grower	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
David Edwards Contract Grower	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Larry Emerson	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with Willow Brook Foods , Inc. as well as the Cargill Defendants
Norman Findahl Contract Grower	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Gary Fisher Contract Grower	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Dorlen Gibbs Contract Grower	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Thomas C. Ginn, Ph.D.	Expert testimony regarding the matters identified in the witness’ Fed. R. Civ. P. 26(a)(2) disclosures, including any related supplements and errata.
George Haegele Contract Grower	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Travis and Gwenneth Horne Contract Growers	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Greg and Jean Hurt Contract Growers	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Moua Joua Contract Grower	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Toby Lester Contract Grower	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Clyde and Helen Masters Contract Growers	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Timothy W. Maupin Vice President of Agriculture Operations Cargill Turkey Production, LLC Cargill Value Added Meats – Retail	Cargill Defendants’ turkey production operations, practices, and policies
Keith and Gerri Mitchell Contract Growers	Turkey growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants

Cargill – Primary Witnesses	
Brian L. Murphy, Ph.D.	Expert testimony regarding the matters identified in the witness' Fed. R. Civ. P. 26(a)(2) disclosures, including any related supplements and errata.
Deryle G. Oxford Vice President of Live Operations Cargill, Inc. (retired)	Cargill Defendants' turkey production operations, practices, and policies
Scott and Michelle Ramsey Contract Growers	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Don and Doris Reed Contract Growers	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Joe Reed Contract Grower	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Nolan and Joan Roberts Contract Growers	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Brenda Roe Accounting Supervisor I Cargill Turkey Production, LLC	Cargill Defendants' turkey production records and accounting
Ken and Linda Rutherford Contract Growers	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Robert Schwabe Contract Grower	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Charles and Sara Swearingen Contract Growers	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
Ken and Donna Thomas Contract Growers	Turkey growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Cargill Defendants
H. Steven Willardsen Business Unit Leader Cargill Value Added Meats – Retail	Cargill Defendants' turkey production operations, practices, and policies
Jason Witt Agriculture Manager Cargill Turkey Production, LLC	Cargill Defendants' turkey production operations, practices, and policies in the IRW

George's – Primary Witnesses	
Gene Pharr-Contract Grower	Poultry growers' obligations under applicable laws, compliance therewith, farm operations and litter management and relationship with George's.
Monty K. Henderson-President/COO	Integrator and grower relationships, practices and policies; George's obligations under applicable laws, compliance therewith, farm operations and litter management.

Benny L. McClure- George's live production	Integrator and grower relationships, practices and policies; George's obligations under applicable laws, compliance therewith, farm operations and litter management.
Ralph Pendergraft- Contract Grower	Poultry growers' obligations under applicable laws, compliance therewith, farm operations and litter management and relationship with George's.
Roger Collins-Litter Hauler	Integrator and grower relationships, practices and policies, particularly re: Simmons

Peterson Farms - Primary Witnesses	
Kirk Houtchens-Former Live Production Manger –Peterson Farms, Inc.	Facts and Circumstances associated with Peterson's operations and relationships with independent contract growers
Corporate Representative(s)	To be determined
Beverly Saunders-Former Peterson Farms Contract Grower – Two Saun Farm	Poultry growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with Peterson.
Woodrow "Al" Saunders-Former Peterson Farms Former Contract Grower – Two Saun Farm	Poultry growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with Peterson.

Simmons - Primary Witnesses	
Mark Simmons	History of Simmons Foods, Inc. and general testimony concerning Simmons Foods, Inc. and its structure, operations, relationship with growers, etc.; Illinois River Watershed Partnership; conversations with Oklahoma and Arkansas officials; any topic covered in his deposition; any other topics as may become relevant after the State puts on its case
Gary Murphy	General testimony concerning Simmons Foods, Inc., its structure, operations, relationships with growers, etc.; any topic covered in his deposition; any other topics as may become relevant after the State puts on its case
Claud Rutherford	General testimony concerning the activities of typical poultry farmers and cattle farmers; nature of relationship between growers and company; work on animal waste management tasks force; conversations with Oklahoma and Arkansas officials; any topic covered in his deposition; any other topics as may become relevant after the State puts on its case
Todd Simmons	General testimony concerning Simmons Foods, Inc., its structure, operations, relationships with growers, etc.; any other topics as may become relevant after the State puts on its case
Gene Woods	History of Simmons Foods, Inc. and general testimony concerning Simmons Foods, Inc. and its structure, operations, relationship with growers, etc.; any other topics as may become relevant after the State puts on its case
Randy Hale	Relationship between growers and company; activities of typical growers and cattle ranchers
Jerry Hunton	Relationship between growers and company; activities of typical growers and cattle ranchers
Jim Hale	Relationship between growers and company; activities of typical growers and cattle ranchers
Randy Ritchie	Relationship between growers and company; activities of typical growers and cattle ranchers

Bill Engleman	Relationship between growers and company; activities of typical growers and cattle ranchers
Mickey Longshore	Relationship between growers and company; activities of typical growers and cattle ranchers
Keith Curry	Relationship between growers and company; practices and habits of service technicians
Jeff Vaughn	Relationship between growers and company; practices and habits of service technicians
Carey Jones	Relationship between growers and company; practices and habits of service technicians
Birchie Hodges	Relationship between growers and company; practices and habits of service technicians
Kenneth Caughman	Knowledge concerning farming practices in the area and the use and non-use of litter and other fertilizers in the IRW;

Tyson Primary Witnesses	
Steven Lynn Butler-Contract Grower – Green Country Farms LLC and Contract Grower Lost Acres Farms (Lost Acres operates in Arkansas and Green Country in OK)	Poultry growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Tyson Defendants
Leasea Butler-GP Production for the US	Cobb-Vantress’s and industry’s business and poultry-related practices and policies
Bill Anderson-Contract Grower	Poultry growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Tyson Defendants
Julie Anderson Chancellor-Contract Grower	Poultry growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Tyson Defendants
James Pigeon, Jr.	Integrator and grower relationships, practices and policies
Randy Robinson-Contract Grower	Poultry growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Tyson Defendants
Randy West-Contract Grower	Poultry growers’ obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Tyson Defendants
James M. Burr-Senior Manager Environmental	Tyson Defendants’ and industry’s business, environmental, and poultry – related practices and policies
Kevin T. Igli-Senior Vice President, Chief Environmental Health and Safety Officer	Tyson Defendants’ and industry’s business, environmental, and poultry – related practices and policies
Steve Patrick-Director Environmental Health & Safety Regulatory and Technical Affairs	Tyson Defendants’ and industry’s business, environmental, and poultry – related practices and policies
Patrick Pilkington-Vice President Live Production Services	Tyson Defendants’ veterinarian program
Donnie King	Historical and present poultry operations owned and operated by defendants in the IRW and the relationships between defendants and contract growers who have in the past or at present raise poultry in the IRW under contract with defendants.

Donnie Smith	Historical and present poultry operations owned and operated by defendants in the IRW and the relationships between defendants and contract growers who have in the past or at present raise poultry in the IRW under contract with defendants.
Beverly Saunders-Contract Grower	Poultry growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Tyson Defendants
Woodrow "Al" Saunders-Contract Grower	Poultry growers' obligations under applicable laws, compliance therewith, farm operations and litter management, and relationship with the Tyson Defendants